

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ1

Request:

The business rules for Performance Measure #55 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 208-210, define “Average Installation Interval” as “Average business days from application date to completion date for N, T, and C orders. The “X” business days is determined based on quantity of UNE stand-alone loops ordered and the associated standard interval.” The business rules indicate that UNE-Ps captured in the POTS or Specials measurements are excluded from the figures used to calculate Performance Measure #55. These business rules say nothing about whether EELs are or are not included in the calculations of performance measure #55. These business rules also indicate that “Illinois requires parity.”

- A. Are any UNE-P combinations included in the figures used to calculate Performance Measure #55?
- B. If you answer to 1.A. was yes, then please answer the following:
 - i. Please list those UNE-P combinations that are included in the figures used to calculate Performance Measure #55. Please identify any UNE-P combination included in the list of 14 UNE-P combinations in ILL. C.C. No. 20, Part 19, Section 15, 4th Revised Sheet No. 2 and ILL C.C. No. 20, Part 19, Section 15, Original Sheet No. 2.1 that is included in the figures used to calculate Performance Measure #55 under all conditions.
 - ii. Please identify any UNE-P combination included in the list of 14 UNE-P combinations in ILL. C.C. No. 20, Part 19, Section 15, 4th Revised Sheet No. 2 and ILL C.C. No. 20, Part 19, Section 15, Original Sheet No. 2.1 that are excluded from the figures used to calculate Performance Measure #55 under some conditions, but that are included under other conditions. For each combination included in your response, please provide a detailed description of the conditions that cause the combination to be included in the calculation of Performance Measure #55.
 - iii. Please provide, by month, the total number of UNE-P combinations installed in each of September 2002, October 2002, and November 2002.
 - iv. Please provide, by month, the total number of UNE-P combinations installed and included in the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002.
 - v. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “UNE-Ps captured in the POTS or Specials measurement.”

- vi. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders that are not N, T, or C.” Please include a description of all types of non N, T, or C orders excluded.
- vii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Telecommunications carrier requested due dates greater than ‘X’ business days as set out below.”
- viii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders where telecommunications carriers are charged expedite charges.”
- ix. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Telecommunications carrier caused misses.” Please include a description of all telecommunications carrier misses, an explanation of how misses are determined to be caused by the telecommunications carrier, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
- x. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders included in PM 55.2”
- xi. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Service requests involving major projects mutually agreed upon by telecommunications carriers and Company. For loops, LNP, LSNP, a project is defined as > 100 lines, trunks, circuits, and or/ telephone numbers.”
- xii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded for reasons not listed in the business rule exclusions.

Please provide a description of all reasons for exclusions not listed in the business rule exclusions.

C. If you answer to 1.A. was yes, please answer the following:

- i. The business rules for Performance Measure #55 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet No. 209, state that “Average Installation Interval” is measured at the element level (e.g., “2-wire Analog loops (1-10)” are disaggregated from “Switch Ports – Analog Port”). Please explain how any UNE-P combinations installed in September, October, or November that were included in the calculation of Performance Measure #55 were included in the disaggregate calculations. For example, if a combination of “2-wire Basic Analog Loop with Basic Line Port” is completed in 4 business days is this registered as both as a 2-wire Analog loop (1-10) completed in 4 business days and as a Switch Ports – Analog Port completed in 4 business days?

D. Are any EEL combinations included in the figures used to calculate Performance Measure #55?

E. If you answer to 1.D. was yes, then please answer the following:

- i. Please list those EEL combinations that are included in the figures used to calculate Performance Measure #55. Please identify any EEL combination included in the list of 8 EEL combinations in ILL. C.C. No. 20, Part 19, Section 20, 4th Revised Sheet No. 1 that is included in the figures used to calculate Performance Measure #55 under all conditions.
- ii. Please identify any EEL combination included in the list of 8 EEL combinations in ILL. C.C. No. 20, Part 19, Section 20, 4th Revised Sheet No. 1 that are excluded from the figures used to calculate Performance Measure #55 under some conditions, but that are included under other conditions. For each combination included in your response, please provide a detailed description of the conditions that cause the combination to be included in the calculation of Performance Measure #55.
- iii. Please provide, by month, the total number of EEL combinations installed in each of September 2002, October 2002, and November 2002.
- iv. Please provide, by month, the total number of EEL combinations installed and included in the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002.
- v. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Orders that are not N, T, or C.” Please include a description of all types of non N, T, or C orders excluded.

- vi. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Telecommunications carrier requested due dates greater than ‘X’ business days as set out below.”
- vii. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Telecommunications carrier caused misses.” Please include a description of all telecommunications carrier misses, an explanation of how misses are determined to be caused by the telecommunications carrier, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
- viii. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Orders included in PM 55.2”
- ix. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Service requests involving major projects mutually agreed upon by telecommunications carriers and Company. For loops, LNP, LSNP, a project is defined as > 100 lines, trunks, circuits, and or/ telephone numbers.”
- x. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded for reasons not listed in the business rule exclusions. Please explain a description of all reasons for exclusions not listed in the business rule exclusions.

F. If you answer to 1.D. was yes, please answer the following:

- i. The business rules for Performance Measure #55 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet No. 209, state that “Average Installation Interval” is measured at the element level (e.g., “2-wire Analog loops (1-10)” are disaggregated from “Dedicated Transport (DSO, DS1, and DS3) (1-10)”). Please explain how any EEL combinations installed in September, October, or November that were included in the calculation of Performance Measure #55 were included in the disaggregate calculations. For example, if a combination of “2-Wire Analog Loop to DS1 Dedicated Transport facilities” is completed in 4 business days is this

registered as both as a 2-wire Analog loop (1-10) completed in 4 business days and as a Switch Ports – Analog Port completed in 4 business days?

- G. Does the average installation interval calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- H. Does the average installation interval calculated for “AIT/Benchmark” include SBC Illinois affiliates? If yes, which affiliates?
- I. When evaluating parity please provide a description of all services SBC Illinois and/or SBC Illinois affiliates provide that are included in the average installation interval “AIT/Benchmark” calculations when evaluating SBC Illinois’ performance in providing:
- i. 2-Wire Analog (1-10)
 - ii. 2-Wire Analog (11-20)
 - iii. 2-Wire Analog (20+)
 - iv. 2-Wire Digital (1-10)
 - v. 2-Wire Digital (11-20)
 - vi. 2-Wire Digital (20+)
 - vii. DS1 loop (includes PRI)
 - viii. Switch Ports – Analog Port
 - ix. Switch Ports – BRI Port (1-50)
 - x. Switch Ports – BRI Port (50+)
 - xi. Switch Ports – PRI Port (1-20)
 - xii. Switch Ports – PRI Port (20+)
 - xiii. DS1 Trunk Port (1 to 10)
 - xiv. DS1 Trunk Port (11 to 20)
 - xv. DS1 Trunk Port (20+)
 - xvi. Dedicated Transport – DS0 (1-10)
 - xvii. Dedicated Transport – DS0 (11-20)
 - xviii. Dedicated Transport – DS0 (20+)
 - xix. Dedicated Transport – DS1 (1-10)
 - xx. Dedicated Transport – DS1 (11-20)
 - xxi. Dedicated Transport – DS1 (20+)
 - xxii. Dedicated Transport – DS3 (1-10)
 - xxiii. Dedicated Transport – DS3 (11-20)
 - xxiv. Dedicated Transport – DS3 (20+)
- J. The business rules for Performance Measure #55 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 209 and 210, state that “Average Installation Interval” is measured at the element level (e.g., “2-wire Analog loops (1-10)” are disaggregated from “Switch Ports – Analog Port”) and that “Illinois requires parity”. ILL. C.C. No. 20, Part 2, Section 11, Original Sheet No. 210 does contain benchmarks measured in days for each element. Please explain the relevance of these benchmarks to the calculation of performance measurement in Illinois, and in particular to the calculation of performance measurement provided in the Hit or Miss Report (“HOMR”) submitted by the Company as Attachment JDE Attachment A-1.

- K. Mr. Ehr states “These changes generally made the SBC Midwest performance measurements consistent with the Texas Version 1.7 measures...” Ehr Affidavit at ¶ 22. Does Texas require parity for Performance Measure #55? If Texas does not require parity for Performance Measure #55 please indicate what standard is used for Performance Measure #55 in Texas. If a benchmark standard is used please list the specific benchmarks for each submeasure of Performance Measure #55.
- L. Do the figures used to calculate Performance Measure #55 include figures for orders where SBC Illinois caused a missed due date? That is, do the figures used to calculate Performance Measure #55 include orders included in the figures in the numerator of Performance Measure # 58?
- M. Do the figures used to calculate Performance Measure #55 include figures for orders where SBC Illinois missed the due date due to lack of facilities? That is, do the figures used to calculate Performance Measure #55 include orders included in the figures in the numerator of Performance Measure # 60?
- N. Do the figures used to calculate Performance Measure #55 include figures for orders which were sent to the FMOD process. That is, do the figures used to calculate Performance Measure #55 include orders included in the figures in the denominator of Performance Measure CLEC WI 11?

Response:

- A. No. Average Installation Interval data for UNE-P is reported under submeasures of PM 27.
- B. See response to JZ1 A above.
- C. See response to JZ1 A above.
- D. The individual loops that are part of an EEL combination are included in PM 55. However, SBC Illinois does not separately track EEL Combinations in the PMs.
- E. See response to JZ1 D.
- F. See response to JZ1 D.
- G. No.
- H. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.
- I. The services are as follows:
- i. 2-Wire Analog (1-10) POTS Res and Bus FW combined

ii. 2-Wire Analog (11-20)	POTS Res and Bus FW combined
iii. 2-Wire Analog (20+)	POTS Res and Bus FW combined
iv. 2-Wire Digital (1-10)	ISDN BRI
v. 2-Wire Digital (11-20)	ISDN BRI
vi. 2-Wire Digital (20+)	ISDN BRI
vii. DS1 loop (includes PRI)	DS1 and ISDN PRI
viii. Switch Ports – Analog Port	VGPL
ix. Switch Ports – BRI Port (1-50)	ISDN BRI (1-50)
x. Switch Ports – BRI Port (50+)	ISDN BRI (50+)
xi. Switch Ports – PRI Port (1-20)	ISDN PRI (1-20)
xii. Switch Ports – PRI Port (20+)	ISDN PRI (20+)
xiii. DS1 Trunk Port (1 to 10)	VGPL (1-20)
xiv. DS1 Trunk Port (11 to 20)	VGPL (11-20)
xv. DS1 Trunk Port (20+)	VGPL (20+)
xvi. Dedicated Transport – DS0 (1-10)	DS0
xvii. Dedicated Transport – DS0 (11-20)	DS0
xviii. Dedicated Transport – DS0 (20+)	DS0
xix. Dedicated Transport – DS1 (1-10)	DS1
xx. Dedicated Transport – DS1 (11-20)	DS1
xxi. Dedicated Transport – DS1 (20+)	DS1
xxii. Dedicated Transport – DS3 (1-10)	DS3
xxiii. Dedicated Transport – DS3 (11-20)	DS3
xxiv. Dedicated Transport – DS3 (20+)	DS3

J. The benchmarks listed in PM 55 define a standard offered interval for the UNE products listed. The standard interval is to be used in the implementation of the fourth exclusion, for orders where the CLEC requests a due date greater than the standard interval. This exclusion is applied in Michigan, Indiana, Wisconsin and Ohio because this measure uses a benchmark standard in those states. However, In Illinois the approved business rule calls for a parity comparison. Corresponding retail orders for SBC Illinois have no standard interval to support a like exclusion. As such, SBC Illinois does not exclude those orders where the CLEC requests a due date greater than the standard interval in order to ensure the proper “apples-to-apples” comparison. As such, the benchmarks have no application to the calculation of results or determination of “make” or “miss” in the HOMR reports.

K. SWBT Version 3.0, the current business rules in Texas, is a diagnostic measure and has no standard of comparison, benchmark or parity.

L. Yes.

M. Yes.

N. Yes.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ2

Request:

The business rules for Performance Measure #55.1 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 211-213, define “Average Installation Interval - DSL” as “Average calendar days from application date to completion date for N, T, or C orders”.

- A. For those measures that are parity measures, does the average installation interval calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- B. Does the average installation interval calculated for “AIT/Benchmark” include SBC Illinois affiliates? If yes, which affiliates?
- C. When evaluating parity please provide a description of all services SBC Illinois and/or SBC Illinois affiliates provide that are included in the average installation interval “AIT/Benchmark” calculations when evaluating SBC Illinois’ performance in providing:
 - i. DSL – With Line Sharing – With Conditioning
 - ii. DSL – With Line Sharing – Without Conditioning
 - iii. DSL – Broadband DSL – Line Sharing
- D. Mr. Ehr states “These changes generally made the SBC Midwest performance measurements consistent with the Texas Version 1.7 measures...” Ehr Affidavit at ¶ 22. Does Texas require parity for “DSL – With Line Sharing – With Conditioning”, “DSL – With Line Sharing – Without Conditioning” and “DSL – Broadband DSL – Line Sharing” Performance Measure #55.1 submeasures? If Texas does not require parity for Performance Measure #55.1 please indicate what standard is used for Performance Measure #55.1 in Texas. If a benchmark standard is used please list the specific benchmarks for each of these Performance Measure #55.1 submeasures.
- E. Do the figures used to calculate Performance Measure #55.1 include figures for orders where SBC Illinois caused a missed due date? That is, do the figures used to calculate Performance Measure #55.1 include orders included in the figures in the numerator of Performance Measure # 58?
- F. Do the figures used to calculate Performance Measure #55.1 include figures for orders where SBC Illinois missed the due date due to lack of facilities? That is, do the figures used to calculate Performance Measure #55.1 include orders included in the figures in the numerator of Performance Measure # 60?
- G. Do the figures used to calculate Performance Measure #55.1 include figures for orders which were sent to the FMOD process. That is, do the figures used to calculate

Performance Measure #55.1 include orders included in the figures in the denominator of Performance Measure CLEC WI 11?

Response:

- A. No.
- B. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.
- C. This PM does not differentiate between DSL Loop types. All are included.
- D. The SWBT Version 3.0 PM 55.1 comparable standards of comparison are listed below:
 - Non-Conditioned Loops with no line sharing– 5 Business Days. Critical z-value applies.
 - Conditioned Loops with no line sharing – 10 Business Days. Critical z-value applies.
 - Loops with line sharing – Parity
- E. The orders that are included in the numerator of PM 58 would also be included in PM 55.1, with the exception of orders where the requested due date is greater than the standard interval and canceled orders.
- F. PM 55.1 includes those orders that are included in PM 60, with the exception of orders where the requested due date is greater than the standard interval. Those orders are excluded from PM 55.1.
- G. PM 55.1 excludes orders where the requested due date is greater than the standard interval. To the extent that FMOD orders in CLEC WI 11 have requested due dates less than or equal to the standard interval, these orders would appear in PM 55.1.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ3

Request:

The business rules for Performance Measure #55.2 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 214-216, define “Average Installation Interval for Loop with LNP” as “Average business days from the receipt of an accurate LSR to completion date for N, T, and C orders excluding customer caused misses and customer requested due date greater than ‘X’ business days. The “X” business days is determined based on quantity of UNE stand-alone loops ordered and the associated standard interval.” The business rules indicate that UNE-Ps captured in the POTS or Specials measurements are excluded from the figures used to calculate Performance Measure #55.2. These business rules say nothing about whether EELs are or are not included in the calculations of performance measure #55.2.

- A. Are any UNE-P combinations included in the figures used to calculate Performance Measure #55.2?
- B. If you answer to 3.A. was yes, then please answer the following:
 - i. Please list those UNE-P combinations that are included in the figures used to calculate Performance Measure #55.2. Please identify any UNE-P combination included in the list of 14 UNE-P combinations in ILL. C.C. No. 20, Part 19, Section 15, 4th Revised Sheet No. 2 and ILL C.C. No. 20, Part 19, Section 15, Original Sheet No. 2.1 that is included in the figures used to calculate Performance Measure #55.2 under all conditions.
 - ii. Please identify any UNE-P combination included in the list of 14 UNE-P combinations in ILL. C.C. No. 20, Part 19, Section 15, 4th Revised Sheet No. 2 and ILL C.C. No. 20, Part 19, Section 15, Original Sheet No. 2.1 that are excluded from the figures used to calculate Performance Measure #55.2 under some conditions, but that are included under other conditions. For each combination included in your response, please provide a detailed description of the conditions that cause the combination to be included in the calculation of Performance Measure #55.2.
 - iii. Please provide, by month, the total number of UNE-P combinations installed in each of September 2002, October 2002, and November 2002.
 - iv. Please provide, by month, the total number of UNE-P combinations installed and included in the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002.
 - v. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “UNE-Ps captured in the POTS or Specials measurement.”

- vi. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #5.25 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders that are not N, T, or C.” Please include a description of all types of non N, T, or C orders excluded.
- vii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Telecommunications carrier requested due dates greater than ‘X’ business days as set out below.”
- viii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Telecommunications carrier caused misses.” Please include a description of all telecommunications carrier misses, an explanation of how misses are determined to be caused by the telecommunications carrier, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
- ix. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Service requests involving major projects mutually agreed upon by telecommunications carriers and Company. For loops, LNP, LSNP, a project is defined as > 100 lines, trunks, circuits, and or/ telephone numbers.”
- x. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “NPAC caused delays unless caused by the Company.” Please include a description of all telecommunications carrier NPAC caused delays, an explanation of how delays are determined to be caused by NPAC, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
- xi. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders where telecommunications carriers are charged expedite charges.”

- xii. Please provide, by month, the total number of UNE-P combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded for reasons not listed in the business rule exclusions. Please provide a description of all reasons for exclusions not listed in the business rule exclusions.
- C. Are any EEL combinations included in the figures used to calculate Performance Measure #55.2?
- D. If you answer to 3.C. was yes, then please answer the following:
- i. Please list those EEL combinations that are included in the figures used to calculate Performance Measure #55.2. Please identify any EEL combination included in the list of 8 EEL combinations in ILL. C.C. No. 20, Part 19, Section 20, 4th Revised Sheet No. 1 that is included in the figures used to calculate Performance Measure #55.2 under all conditions.
 - ii. Please identify any EEL combination included in the list of 8 EEL combinations in ILL. C.C. No. 20, Part 19, Section 20, 4th Revised Sheet No. 1 that are excluded from the figures used to calculate Performance Measure #55.2 under some conditions, but that are included under other conditions. For each combination included in your response, please provide a detailed description of the conditions that cause the combination to be included in the calculation of Performance Measure #55.2.
 - iii. Please provide, by month, the total number of EEL combinations installed in each of September 2002, October 2002, and November 2002.
 - iv. Please provide, by month, the total number of EEL combinations installed and included in the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002.
 - v. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #5.25 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Orders that are not N, T, or C.” Please include a description of all types of non N, T, or C orders excluded.
 - vi. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Telecommunications carrier requested due dates greater than ‘X’ business days as set out below.”

- vii. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Telecommunications carrier caused misses.” Please include a description of all telecommunications carrier misses, an explanation of how misses are determined to be caused by the telecommunications carrier, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
 - viii. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “Service requests involving major projects mutually agreed upon by telecommunications carriers and Company. For loops, LNP, LSNP, a project is defined as > 100 lines, trunks, circuits, and or/ telephone numbers.”
 - ix. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of EEL combinations that were excluded under the business rule exclusion “NPAC caused delays unless caused by the Company.” Please include a description of all telecommunications carrier NPAC caused delays, an explanation of how delays are determined to be caused by NPAC, and identify who (i.e. SBC Illinois, the telecommunications carrier, or both) make this determination.
 - x. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded under the business rule exclusion “Orders where telecommunications carriers are charged expedite charges.”
 - xi. Please provide, by month, the total number of EEL combinations installed but excluded from the calculations of Performance Measure #55.2 in each of September 2002, October 2002, and November 2002. Include only the number of UNE-P combinations that were excluded for reasons not listed in the business rule exclusions. Please provide a description of all reasons for exclusions not listed in the business rule exclusions.
- E. Does the average installation interval calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?

Response:

- A. No. Average Installation Intervals for UNE-P orders are reported in PM 27.
- B. See response to JZ3 A above.

- C. No.
- D. See response to JZ3 C above.
- E. No.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ4

Request:

The business rules for Performance Measure #56 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 219 and 221, define “Percent Installations Completed Within Customer Requested Due Date” as “Percent of installations completed within customer requested due date when the date is later than or equal to the standard offered interval as defined in the telecommunications carrier manual or, if expedited (accepted or not accepted), the date agreed to by the Company.”

- A. Does the percentage installations completed within customer requested due date calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- B. Does the percentage installations completed within customer requested due date calculated for “AIT/Benchmark” include SBC Illinois affiliates? If yes, which affiliates?
- C. When evaluating parity please provide a description of all services SBC Illinois and/or SBC Illinois affiliates provide that are included in the average installation interval “AIT/Benchmark” calculations when evaluating SBC Illinois’ performance in providing:
 - i. 2-Wire Analog (1-10)
 - ii. 2-Wire Analog (11-20)
 - iii. 2-Wire Analog (20+)
 - iv. 2-Wire Digital (1-10)
 - v. 2-Wire Digital (11-20)
 - vi. 2-Wire Digital (20+)
 - vii. DS1 loop (includes PRI)
 - viii. Switch Ports – Analog Port
 - ix. Switch Ports – BRI Port (1-50)
 - x. Switch Ports – BRI Port (50+)
 - xi. Switch Ports – PRI Port (1-20)
 - xii. Switch Ports – PRI Port (20+)
 - xiii. DS1 Trunk Port (1 to 10)
 - xiv. DS1 Trunk Port (11 to 20)
 - xv. DS1 Trunk Port (20+)
 - xvi. Dedicated Transport – DS0 (1-10)
 - xvii. Dedicated Transport – DS0 (11-20)
 - xviii. Dedicated Transport – DS0 (20+)
 - xix. Dedicated Transport – DS1 (1-10)
 - xx. Dedicated Transport – DS1 (11-20)
 - xxi. Dedicated Transport – DS1 (20+)
 - xxii. Dedicated Transport – DS3 (1-10)
 - xxiii. Dedicated Transport – DS3 (11-20)
 - xxiv. Dedicated Transport – DS3 (20+)
 - xxv. DSL with Line Sharing

- D. Original Sheet No. 222 lists a number of benchmark numbers associated with the submeasures for Performance Measure 56. Please explain the relevance of these benchmarks to the calculation of performance measurement in Illinois, and in particular to the calculation of performance measurement provided in the Hit or Miss Report (“HOMR”) submitted by the Company as Attachment JDE Attachment A-1.
- E. The Hit or Miss Report (“HOMR”) submitted by the Company as Attachment JDE Attachment A-1 indicates that submeasures 56 – 12.1 (“DSL with no Line Sharing – Non Conditioned”) and 56 - 12.2 (“DSL with no Line Sharing –Conditioned”) are benchmark measures rather than parity measures. Are submeasures 56 – 12.1 and 56 – 12.2 benchmark measures? If yes, then how is a benchmark applied with respect to a customer requested due date? In particular, Mr. Ehr indicates that for DSL with no Line Sharing – Non Conditioned the benchmark is “95% within 5 days.” Ehr Affidavit at ¶ 104. Does this indicate that an order only enters the numerator of this measure if the request is filled more than 5 days after the customer requested due date. Similarly, for DSL with no Line Sharing – Conditioned, the benchmark is 95% within 10 days. Ehr Affidavit at ¶ 104. Does this indicate that an order only enters the numerator of this measure if the request is filled more than 10 days after the customer requested due date?
- F. Do the figures used to calculate Performance Measure #56 include figures for orders where SBC Illinois caused a missed due date? That is, do the figures used to calculate the denominator of Performance Measure #56 include orders included in the figures in the numerator of Performance Measure # 58?
- G. Do the figures used to calculate Performance Measure #56 include figures for orders where SBC Illinois missed the due date due to lack of facilities? That is, do the figures used to calculate the denominator of Performance Measure #56 include orders included in the figures in the numerator of Performance Measure # 60?
- H. Do the figures used to calculate Performance Measure #56 include figures for orders which were sent to the FMOD process. That is, do the figures used to calculate the denominator of Performance Measure #56 include orders included in the figures in the denominator of Performance Measure CLEC WI 11?
- I. Does the denominator for Performance Measure #56 include all orders captured in Performance Measure #55 depending on the respective submeasure? (For example, does the denominator of Performance Measure #56 for the submeasure DSL – w/no Line Sharing – Non Conditioned contain all order captured in the denominator of Performance Measure # 55.1 DSL – With Out Line Sharing – Without Conditioning?)
- J. Are any UNE-P combinations included in the figures used to calculate Performance Measure #56?
- K. Are any EEL combinations included in the figures used to calculate Performance Measure #56?

Response:

- A. No.
- B. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.

- C. The services are as follows:

xxvii. 2-Wire Analog (1-10)	POTS Res and Bus FW combined (1-10)
xxviii. 2-Wire Analog (11-20)	POTS Res and Bus FW combined (11-20)
xxix. 2-Wire Analog (20+)	POTS Res and Bus FW combined (20+)
xxx. 2-Wire Digital (1-10)	ISDN BRI (1-10)
xxxi. 2-Wire Digital (11-20)	ISDN BRI (11-20)
xxxii. 2-Wire Digital (20+)	ISDN BRI (20+)
xxxiii. DS1 loop (includes PRI)	DS1 and ISDN PRI
xxxiv. Switch Ports – Analog Port	VGPL
xxxv. Switch Ports – BRI Port (1-50)	ISDN BRI (1-50)
xxxvi. Switch Ports – BRI Port (50+)	ISDN BRI (50+)
xxxvii. Switch Ports – PRI Port (1-20)	ISDN PRI (1-20)
xxxviii. Switch Ports – PRI Port (20+)	ISDN PRI (20+)
xxxix. DS1 Trunk Port (1 to 10)	VGPL (1-10)
xl. DS1 Trunk Port (11 to 20)	VGPL (11-20)
xli. DS1 Trunk Port (20+)	VGPL (20+)
xl.ii. Dedicated Transport – DS0 (1-10)	DS0 (1-10)
xl.iii. Dedicated Transport – DS0 (11-20)	DS0 (11-20)
xl.iv. Dedicated Transport – DS0 (20+)	DS0 (20+)
xl.v. Dedicated Transport – DS1 (1-10)	DS1 (1-10)
xl.vi. Dedicated Transport – DS1 (11-20)	DS1 (11-20)
xl.vii. Dedicated Transport – DS1 (20+)	DS1 (20+)
xl.viii. Dedicated Transport – DS3 (1-10)	DS3 (1-10)
xl.ix. Dedicated Transport – DS3 (11-20)	DS3 (11-20)
l. Dedicated Transport – DS3 (20+)	DS3 (20+)
li. DSL with Line Sharing	DSL LineShare
lii. UNE Loop Projects	Compare to combined results for POTS Res/Bus FW, ISDN-Basic, POTS ISDN, ISDN-Prime, DS1 and Affiliate results for DSL Loops and DSL Line share

- D. The number of days has no applicability to the calculation of results in PM 56 for SBC Illinois, as the comparison under the 01-0120 Plan is parity with Retail or Affiliate, whichever is greater.
- E. There is an oversight in the HOMR report included as Attachment A to the Ehr Affidavit. The HOMR report indicates a Benchmark but does not provide one and therefore does

not determine make or miss. The benchmark is 95% within 5 days, and performance for all three months exceeded the benchmark. The result is understated HOMR performance. Two more measures should be included in both the denominator and numerator in each month, and for the “two-out-of-three” months analysis.

- F. Orders included in PM 58 are also included in the numerator of PM 56, except where those orders have a requested due date less than the standard interval and canceled orders.
- G. PM 56 includes those orders that are included in PM 60, with the exception of orders where the requested due date is less than the standard interval.
- H. Yes, with the exception of orders in CLEC WI 11 where the customer requested a due date less than the standard interval.
- I. No. Pm 56 only measures those orders where the CLEC requested a due date greater than or equal to the standard interval, with other exclusions listed in the PM applied. If the CLEC requested a due date less than the standard interval, the order is excluded in PM 56.
- J. No.
- K. Yes, under the submeasure for the Loop component of the EEL.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ5

Request:

The business rules for Performance Measure #56.1 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 219 and 221, define “Percent Installations Completed Within Customer Requested Due Date for Loop With LNP” as “Percent of installations completed within customer requested due date when the date is later than or equal to the standard offered interval as defined in the telecommunications carrier manual or, if expedited (accepted or not accepted), the date agreed to by the Company.”

- A. Do the figures used to calculate Performance Measure #56.1, Submeasures 01.1-01.3 (Aggregate Loop with LNP (1-10), Aggregate Loop with LNP (11-20), and Aggregate Loop with LNP (>20), respectively) include figures for orders where SBC Illinois caused a missed due date? That is, do the figures used to calculate the denominator of Performance Measure #56.1 include orders included in the figures in the numerator of Performance Measure # 58?
- B. Do the figures used to calculate Performance Measure #56.1, Submeasures 01.1-01.3 (Aggregate Loop with LNP (1-10), Aggregate Loop with LNP (11-20), and Aggregate Loop with LNP (>20), respectively) include figures for orders where SBC Illinois missed the due date due to lack of facilities? That is, do the figures used to calculate the denominator of Performance Measure #56.1 include orders included in the figures in the numerator of Performance Measure # 60?
- C. Do the figures used to calculate Performance Measure #56.1, Submeasures 01.1-01.3 (Aggregate Loop with LNP (1-10), Aggregate Loop with LNP (11-20), and Aggregate Loop with LNP (>20), respectively) include figures for orders which were sent to the FMOD process. That is, do the figures used to calculate the denominator of Performance Measure #56.1 include orders included in the figures in the denominator of Performance Measure CLEC WI 11?
- D. Does the “Percent Installations Completed Within Customer Requested Due Date for Loop With LNP” calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- E. Are any UNE-P combinations included in the figures used to calculate Performance Measure #56.1?
- F. Are any EEL combinations included in the figures used to calculate Performance Measure #56.1?

Response:

- A. Yes, except for those orders with a requested due date less than the standard interval and for canceled orders included in PM 58.

- B. Yes, with the exception of orders where the requested due date is less than the standard interval.
- C. Yes, with the exception of FMOD orders where the CRDD is less than the standard interval.
- D. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.
- E. No.
- F. No.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ6

Request:

The business rules for Performance Measure #58 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 227 - 229, define “Percent Company Caused Missed Due Dates” as “Percentage of items where installations are not completed by the negotiated due date.”

- A. Does the denominator for Performance Measure #58 include all orders captured in Performance Measure #55 or #55.1 depending on the respective submeasure? (For example, does the denominator of Performance Measure #58 for the submeasure DSL Loops – No Line Sharing contain all orders captured in the denominator of Performance Measure # 55.1 DSL – With Out Line Sharing – Without Conditioning?)
- B. Does the denominator for Performance Measure #58 include orders captured in Performance Measure #55.2 depending on the respective submeasure? (For example, does the denominator of Performance Measure #58 for the submeasure 8.0 dB Loop Without Test Access contain any orders captured in the denominator of Performance Measure # 55.2 for the submeasure Loop with LNP – CHC with LNP (1-10)?)
- C. Does the denominator for Performance Measure #58 include orders captured in Performance Measure #56 depending on the respective submeasure?
- D. Does the denominator for Performance Measure #58 include orders captured in Performance Measure #56.1 depending on the respective submeasure?
- E. Do the figures used to calculate Performance Measure #58 include figures for orders where SBC Illinois missed a due date because of lack of facilities? That is, do the figures used to calculate the numerator of Performance Measure #58 include orders included in the figures in the numerator of Performance Measure # 60?
- F. Are any UNE-P combinations included in the figures used to calculate Performance Measure #56.1?
- G. Are any EEL combinations included in the figures used to calculate Performance Measure #56.1?
- H. Does the Percent Company Caused Missed Due Dates calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- I. Does the Percent Company Caused Missed Due Dates calculated for “AIT/Benchmark” include SBC Illinois affiliates? If yes, which affiliates?
- J. The business rules for Performance Measure #58 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet No. 229 indicate that the retail comparison for 8.0 dB loops are POTS (Res/Bus and FW). What is FW an acronym for?

Response:

- A. No, not all. PM 58 does not include orders that are included in PM CLEC WI 11 and are included in PMs 55 and 55.1
- B. Yes, except for those orders excluded from PM 58 that are included in PM CLEC WI 11 and are included in PM 55.2.
- C. Yes, except for orders excluded from PM 58 because they are included in PM CLEC WI 11 and are included in PM 56.
- D. Yes, except for orders excluded from PM 58 because they are included in PM CLEC WI 11 and are included in PM 56.1.
- E. Yes, except for orders excluded from PM 58 because they are included in PM CLEC WI 11 and are included in PM 60.
- F. No.
- G. Yes, under the submeasure for the Loop component of the EEL.
- H. No.
- I. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.
- J. Field Work

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ7

Request:

The business rules for Performance Measure #60 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 233 - 235, define “Percent Company Missed Due Dates Due to Lack of Facilities” as “Percentage of items with missed due dates due to lack of facilities.”

- A. Does the denominator for Performance Measure #60 include all orders captured in Performance Measure #55 or #55.1 depending on the respective submeasure? (For example, does the denominator of Performance Measure #60 for the submeasure DSL Loops – No Line Sharing contain all orders captured in the denominator of Performance Measure # 55.1 DSL – With Out Line Sharing – Without Conditioning?)
- B. Does the denominator for Performance Measure #60 include orders captured in Performance Measure #55.2 depending on the respective submeasure? (For example, does the denominator of Performance Measure #60 for the submeasure 8.0 dB Loop Without Test Access contain any orders captured in the denominator of Performance Measure # 55.2 for the submeasure Loop with LNP – CHC with LNP (1-10)?)
- C. Does the denominator for Performance Measure #60 include orders captured in Performance Measure #56 depending on the respective submeasure?
- D. Does the denominator for Performance Measure #60 include orders captured in Performance Measure #56.1 depending on the respective submeasure?
- E. Do the figures in the denominator of Performance Measure #60 include figures in the denominator of Performance Measure # 58 depending on the respective submeasures?
- F. Do the figures in the denominator of Performance Measure #60 include figures in the denominator of Performance Measure # CLEC WI 11 depending on the respective submeasures?
- G. Are any UNE-P combinations included in the figures used to calculate Performance Measure #60?
- H. Are any EEL combinations included in the figures used to calculate Performance Measure #60?
- I. Does the Percent Missed Due Dates Due to Lack of Facilities calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- J. Does the Percent Missed Due Dates Due to Lack of Facilities calculated for “AIT/Benchmark” include SBC Illinois affiliates? If yes, which affiliates?

Response:

- A. No, by definition, PM 60 is only orders missed due to lack of facilities.
- B. Yes, to the extent that the order included in PM 55.2 was missed due to lack of facilities.
- C. Yes, to the extent that the order included in PM 56 was missed due to lack of facilities.
- D. Yes, to the extent that the order included in PM 56.1 was missed due to lack of facilities.
- E. Yes, to the extent that the order included in PM 58 was missed due to lack of facilities and was not a canceled order.
- F. Yes, to the extent those orders are missed due to lack of facilities and are not a Disconnect Action Code.
- G. No.
- H. Yes, under the submeasure for the Loop component of the EEL.
- I. No.
- J. Under the 01-0120 Plan, performance is compared to the better of SBC Illinois Retail or Affiliate. If the affiliate had better performance, the comparison is to the affiliate. The affiliate is Advanced Solutions Inc, also known as Ameritech Advanced Data Solutions of Illinois, Inc.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Staff Data Request JZ8

Request:

The business rules for Performance Measure #CLEC WI 11 found in ILL. C.C. No. 20, Part 2, Section 11, Original Sheet Nos. 382 - 384, define “FMOD Process: Forms B, C, D – percentage of due dates met” as “Measures the percentage of due dates met when FMOD process invoked.”

- A. Does the Percent Missed Due Dates Due to Lack of Facilities calculated for “CLEC” include SBC Illinois affiliates? If yes, which affiliates?
- B. Are any UNE-P combinations included in the figures used to calculate Performance Measure #CLEC WI 11?
- C. Are any EEL combinations included in the figures used to calculate Performance Measure #CLEC WI 11?
- D. Do the figures in the denominator of Performance Measure #CLEC WI 11 include figures in the denominator of Performance Measure #60 depending on the respective submeasures?
- E. In the Hit or Miss Report (“HOMR”) submitted by the Company as Attachment JDE Attachment A-1 the calculations appear to be incorrect. For example, C WI 11 – 0.16 indicates that for September 2002 25% of CLEC due dates were met. The HOMR indicates that only 7.02% of AIT/Benchmark due dates were met. Although CLEC due dates were met much more frequently than AIT/Benchmark due dates, the HOMR includes a result of no for September 2002 for C WI 11-0.16. Does the data in the HOMR report for C WI 11 reflect missed due dates rather than met due dates? If no, please explain.

Response:

- A. No.
- B. No.
- C. Yes, under the submeasure for the Loop component of the EEL.
- D. Yes, as long as the order entered the FMOD process.
- E. The data reflects missed due dates. There is a conflict between the measurement title and the measurement calculation in the current business rule. SBC Illinois’ implementation follows the calculation logic, which generates the percentage of due dates missed, not the percentage met. In the recently completed six-month review, the collaborative agreed to change the calculation to match the title and definition of the PM.

Person Responsible: James Ehr

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 10.0

Request:

Mr. Alexander states that a CLEC may elect to "...negotiate an interconnection agreement which incorporates by reference the applicable tariff UNE provisions (in lieu of negotiating UNE provisions with SBC Illinois)..." Alexander Phase 1A Compliance Affidavit at ¶ 4.

- A. Does SBC Illinois permit a carrier signing a new agreement to include by reference any SBC Illinois tariffed UNE including the tariffed rates, terms, and conditions? If not, please explain any restrictions the company imposes on inclusion.
- B. Does SBC Illinois permit a carrier with an existing effective agreement to amend that agreement by replacing the agreements rates, terms, and conditions for a UNE with a reference to the Company's tariffed rates, terms, and conditions for the UNE? If not, please explain any restrictions the company imposes on such amendments.

Response:

- A. Yes. A carrier negotiating a new agreement with SBC Illinois may request to include in such agreement, by reference, SBC Illinois' UNE tariffs – inclusive of all UNE rates, terms and conditions contained in such tariffs, as such tariffs may be modified from time to time. SBC Illinois' policy in this regard was explained in Mr. Alexander's Phase 1A Compliance Affidavit paragraphs 5-11.
- B. See response to data request 10A above.

Person Responsible: Scott Alexander

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 11.0

Request:

Mr. Alexander states that a CLEC may elect to "...opt into' UNE arrangements from another approved effective agreement..." Alexander Phase 1A Compliance Affidavit at ¶ 4.

- A. Does SBC Illinois permit a carrier signing a new agreement to include any UNE rates, terms, and conditions included in any of the Company's currently effective interconnection agreements? If not, please explain any restrictions the company imposes on inclusion.
- B. Does SBC Illinois permit a carrier with an existing effective agreement to amend that agreement to include any UNE rates, terms, and conditions included in any of the Company's currently effective interconnection agreements? If not, please explain any restrictions the company imposes on inclusion.

Response:

- A. Yes. SBC Illinois permits a carrier signing a new agreement to include in its interconnection agreement the UNE rates, terms and conditions (and any legitimately related terms) which such carrier elects to adopt from another SBC Illinois ICC-approved and effective interconnection agreement which is available for adoption under Section 252(i) of the Act. SBC Illinois' opt-in policies are administered consistently with the policies outlined in response to Data Request JZ 10.0.
- B. See SBC Illinois' response to Data Request 11.A.

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 12.0

Request:

Mr. Alexander states that "...the list of UNEs in SBC's tariffs and the associated rates are in most cases substantially the same as the set of UNEs offered in its interconnection agreements." Alexander Phase 1A Compliance Affidavit at ¶ 10.

- A. Is it the Company's contention that in most cases the terms and conditions for UNEs offered in SBC Illinois' interconnection agreements are currently included in the Company's Illinois tariffs?
- B. Please provide a list of all UNEs that are included in existing interconnection agreements, but which are not currently tariffed in Illinois.
- C. Please provide a list of all UNE rates that are included in existing interconnection agreements, but which are not currently tariffed in Illinois.
- D. Please provide a list of all UNE terms and conditions that are included in existing interconnection agreements, but which are not currently tariffed in Illinois.

Response:

- A. SBC Illinois has not made a representation that "in most cases the terms and conditions for UNEs offered in SBC Illinois' interconnection agreements are currently included in the Company's Illinois tariffs. "

Mr. Alexander and other SBC Illinois affiants have filed affidavits and testimony in this proceeding that demonstrate that SBC Illinois offers UNEs that are required under the FCC's rules and that such UNEs are contained in SBC Illinois' effective tariffs and interconnection agreements, as applicable.

Notwithstanding the above, it should be noted that, collectively, the set of more than 100 currently effective interconnection agreements in Illinois contains varying language and provisions for UNEs that have been developed through negotiations and arbitration over a course of several years. They have also been developed as contractual, rather than tariff, provisions. Accordingly, not all interconnection agreement provisions will be identical to those that are "currently included" in the Company's tariffs. However, SBC Illinois is willing to offer to CLECs in Illinois all UNEs that it is obligated to provide under Section 251(c)(3) of the Act.

- B. SBC Illinois has not attempted to identify every UNE that may be included in an existing Illinois interconnection agreement and then to compare such information with the UNEs set forth in the Illinois tariff. Nevertheless, as previously identified in this proceeding,

DS-3 loops are available and provided to CLECs in Illinois via their interconnection agreements with SBC Illinois, but are not yet offered in an effective tariff (the Company's December UNE filing included the DS-3 loop, but that tariff filing was suspended).

- C. SBC Illinois has not attempted to review every rate or rate element in each interconnection agreement and compare them to the currently effective tariff. However, in preparing his affidavit, Mr. Alexander reviewed the following tariff sheets from SBC Illinois' UNE tariffs for major UNE offerings and compared such rates to those in a representative ICA pricing appendix and the rates were the same:

UNE Loops (Part 19, Section 2,): Sheet Nos. 31, 33, 34

ULS (Part 19, Section 3): Sheet Nos. 40.

Unbundled Interoffice Transport (Part 19, Section 12): Sheet Nos. 30,31, 32, 33, 34, 35, 36, 37, 38, 39, 40,

ULS-ST (Part 19, Section 21): Sheet No. 40, 42

- D. The requested information is not available.

Person Responsible: Scott Alexander

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 13.0

Request:

Mr. Silver states “The currently effective Illinois NRCs for new UNE-P combinations, new EELs and SA to UNE conversions are included in tariff sheets approved by the Commission in Order on Reopening issued on April 30, 2002, in Docket 98-0396.” Silver Phase 1A Compliance Affidavit at ¶ 5.

- A. Are the Company’s tariffed UNE rates the rates that the Company is relying on to prove compliance with Section 271 in this proceeding? If no, what rates is the Company relying on to prove compliance with Section 271 in this proceeding.
- B. Please provide currently effective interconnection agreement that reflect the Company’s tariffed UNE rates and identify which tariffed rates are included in which interconnection agreements. Also identify any tariffed UNE rate that is not reflected in any currently effective interconnection agreement.

Response:

- A. SBC Illinois objects to this request on the grounds that it requests information that goes beyond the scope of Mr. Silver’s Phase 1 Compliance Affidavit. Mr. Silver’s affidavit addresses the requirements of paragraphs 686(d) and(e) and 693(i) relating to non-recurring charges for UNE combinations. As indicated by Mr. Silver’s affidavit, the Company is relying on the currently effective NRCs for new UNE-P, new EELs and SA to UNE conversions combinations included in the tariff sheets approved by the Commission in the Order on Reopening issued in Docket 98-0396.
- B. SBC Illinois objects to this request on the grounds stated in support of the objection to subpart A, above. Notwithstanding and without waiving this objection, SBC refers Staff to the response to JZ 12.0 (C).

Person Responsible: Michael Silver

**Illinois Commerce Commission
Docket 01-0662
Data Request JZ 16.0**

Request:

Mr. Silver States that “[t]he Michigan rates reflect the TELRIC rates referenced in Michigan Public Service Commission (“MPSC”) Tariff No. 20R, Part 19...” Silver Phase 1A Compliance Affidavit at ¶ 5. Is SBC Michigan relying on the rates from Tariff No. 20R, Part 19 to prove compliance with Section 271 in Michigan? If not, what rates is the Company relying on to prove compliance with Section 271 in Michigan? Please provide those rates.

Response:

Yes. In addition, SBC Michigan also relied upon the AT&T/SBC Michigan ICA Pricing Appendix.

Person Responsible: Michael Silver

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 17.0

Request:

Attachment MDS-1 contains a list of NRCs that the Company assesses for a New UNE-P in Illinois.

- A. Does the Company assess a ULS Billing Establishment Charge for the New UNE-Ps described in Schedule MDS-1? If so, please explain and provide any comparable charges assessed in California, Texas, and Michigan.
- B. Does the Company assess any other NRCs for the New UNE-Ps described in Schedule MDS-1? If so please explain and provide any comparable charges assessed in California, Texas, and Michigan.

Response:

- A. SBC Illinois objects to this request on the grounds that it calls for the production of information that goes beyond the compliance requirements for Phase 2 established by the Phase 1 Order in this case. In accordance with paragraph 693 of the Order, the rates for which SBC Illinois is required to provide a “zone of reasonableness analysis” are interim rates identified in Attachment A to Staff’s “Supplement to Update Summary of Staff’s Proposed Remedial Actions for Ameritech Illinois”, filed on December 2, 2002. The ULS Billing Establishment Charge is not listed on Attachment A. Furthermore, the Billing Establishment Charge is a permanent rate approved by the Commission in Docket 00-700. Accordingly, this rate must be deemed “TELRIC Compliant” for purposes of Paragraph 713(e) and 719 of the Phase 1 Order, without regard to any comparison to rates established in another jurisdiction. Notwithstanding and without waiving this objection, SBC Illinois states that it assesses a ULS Billing Establishment Charge when a CLEC is not already purchasing Unbundled Local Switching from the switch it is requesting the UNE-P from. The applicable charge in those instances would be \$136.76 as found in ILL C.C. Tariff 20, Part 19, Section 15, Sheet no. 12. The comparable charge in Michigan is called ULS Usage Billing and Trunk Order Development Charge, and the charge is \$163.82. The charge is identified as being applicable in MPSC Tariff 20R, Part 19, Section 23, Sheet 12 and cross-references the rate found in MPSC Tariff 20R, Part 19, Section 3, Sheet 45. There is no such comparable rate element at this time in either Texas or California.
- B. SBC Illinois objects to this request on the same grounds as the objection to the request in Subpart A, above. The other NRCs for which information is requested in this subpart B were not listed on Attachment A to Staff’s “Supplement to Update Summary of Staff’s Proposed Remedial Actions for Ameritech Illinois”. Furthermore, the rates are permanent rates approved by the Commission in Docket 96-0486 and 96-0569 (Consol.). Notwithstanding and without waiving this objection, SBC Illinois states that, as indicated

by ILL C.C. Tariff No. 20, Part 19, Section 15 and MI Tariff 20R, Section 23, cross referenced to Section 3, in addition to the charges shown on Attachment MDS-1, on a new UNE-P order a CLEC may be charged other NRCs. These include Port Feature Add/Change translation charges (for which there is no established rate at this time) and Custom Routing NRCs which will vary based on whether the requested custom routing is via Line Class Code or AIN, and if via Line Class Code, whether a new Line Class Code needs to be established. CA and TX also have charges for feature add/ changes (\$0.05 per feature in Texas and \$0.16 per order in CA) and custom routing, for which the NRCs are on an ICB basis in both Texas and California.

Person Responsible: Michael Silver

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 18.0

Request:

Scenarios 1, 2, 5 in MDS-5 all include a charge for ULS Billing Establishment. It is Staff's understanding that the ULS Establishment Billing Establishment Charge applies per carrier per switch. If a CLEC serves an existing UNE-P customer through an Ameritech switch, will the CLEC ever be assessed a ULS Billing Establishment Charge if it requests additional UNE-P of any type that makes use of that switch? If yes, please explain.

Response:

SBC Illinois objects to this request on the same grounds as stated in objection to Data Request Item JZ 17 (A). Notwithstanding this objection, SBC Illinois states that the charge does apply on a per switch basis, and it will not apply if a CLEC serves an existing UNE-P customer through an Ameritech switch, and it requests additional UNE-P of any type that makes use of that switch.

Person Responsible: Michael Silver

Illinois Commerce Commission
Docket 01-0662
Data Request JZ 19.0

Request:

In its Memorandum Opinion and Order, In the Matter of Joint Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri, CC Docket No. 01-194, Released November 16, 2001, the FCC at ¶ 57 stated:

As the Commission has previously noted, our USF cost model provides a reasonable basis for comparing cost differences between states.

Please provide an assessment of the costs differences between Illinois and each of Texas, California, and Michigan based on the FCC's USF cost model. Please provide separate information for loop and non-loop costs differences.

Response:

	<u>Loop</u>	<u>Non-Loop</u>	<u>Total</u>
Illinois	\$11.09	\$3.47	\$14.56
Texas	12.78	3.79	16.57
California	11.03	3.71	14.74

To date, no USF cost model assessment has been performed for Michigan.

Person Responsible: Michael Silver

**Illinois Commerce Commission
Docket 01-0662
Data Request JZ 20.0**

Request:

Please provide a comparison of IL UNE-P rates to UNE-P rates from Texas, California, and Michigan, which includes both recurring and non-recurring charges, similar to that presented for EELs in Attachment MDS-2. Please provide support schedules for IL UNE-P rates similar to support provided for EELs in Attachment MDS-2A.

Response:

The recurring rates reflect a weighted average of the zoned UNE rates in each state.

	IL	TX	CA
Loop Recurring	\$ 9.39	\$ 14.10	\$ 9.93
Non-Loop Recurring	\$ 2.52	\$ 6.31	\$ 3.78
Total Recurring	\$ 11.91	\$ 20.41	\$ 13.71
Non-Recurring	\$ 21.23	\$ 39.40	\$ 39.36
Total First Months UNE-P	\$ 33.14	\$ 59.81	\$ 53.07

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Request:

Please provide a comparison of IL UNE-P rates to UNE-P rates from Texas, California, and Michigan, which includes both recurring and non-recurring charges, similar to that presented for EELs in Attachment MDS-2. Please provide support schedules for IL UNE-P rates similar to support provided for EELs in Attachment MDS-2A.

Supplemental Response:

	IL	TX	CA
Loop Recurring	\$ 9.39	\$ 14.10	\$ 9.93
Port	\$ 2.18	\$ 2.22	\$ 0.99
Switching		\$ 3.55	\$ 1.82
Signaling	\$ 0.03	\$ 0.02	
Transport	\$ 0.31	\$.052	\$ 0.97
Subtotal Non-Loop Recurring	\$ 2.52	\$ 6.31	\$ 3.78
Total Recurring	\$ 11.91	\$ 20.41	\$ 13.71
Non-Recurring	\$ 21.23	\$ 39.40	\$ 39.36
Total First Months UNE-P	\$ 33.14	\$ 59.81	\$ 53.07

TX has an explicit rate for SS7 Signaling. In CA this element is part of ULS Call Setup.

Person Responsible: Michael Silver